

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

FEB 07 2019

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

vs.

MIKEL MARQUISE TOLIVER aka Mike

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§
§

CRIMINAL NO.

19 CR 100

CRIMINAL INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE
(Sex Trafficking)

From on or about April 10, 2017, through July 27, 2017, in the Southern District of Texas and elsewhere,

MIKEL MARQUISE TOLIVER, aka Mike

defendant herein, in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means a person, namely a minor female known as MV1, who was under 18, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, advertising, patronizing and soliciting by any means MV1 knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause MV1 to engage in a commercial sex act, and that (2) MV1, whom defendant had a reasonable opportunity to observe, had not attained the age of 18 years and would be caused to engage in a commercial sex.

In violation of Title 18, United States Code, Sections 1591(a), (b)(1) and (b)(2).

COUNT TWO
(Sex Trafficking)

From on or about February 23, 2018, through February 24, 2018, in the Southern District of Texas and elsewhere,

MIKEL MARQUISE TOLIVER, aka Mike

defendant herein, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means a person, namely a minor female known as MV2, who was under 18, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, advertising, patronizing and soliciting by any means knowing and in reckless disregard of the fact that, MV2, whom defendants had a reasonable opportunity to observe, had not attained the age of 18 years and would be caused to engage in a commercial sex.

In violation of Title 18, United States Code, Sections 1591(a), and (b)(2).

NOTICE OF FORFEITURE
(18 U.S.C. § 1594(d))

Pursuant to Title 18, United States Code, Section 1594(d), the United States gives notice to defendants,

MIKEL MARQUISE TOLIVER, aka Mike


that in the event of conviction of any of the offenses charged in Counts One and Two of this Indictment, the following property is subject to forfeiture:

(1) all real and personal property that was involved in, used, or intended to be used to commit or to

facilitate the commission of such violation and all property traceable to such property; and
(2) all real and personal property constituting or derived from, proceeds obtained, directly or indirectly, as a result of such violation and all property traceable to such property.

Money Judgment and Substitute Assets

Defendant is notified that in the event of conviction, a money judgment may be imposed.
In the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendants up to the total value of the property subject to forfeiture.

A True Bill: 

ORIGINAL SIGNATURE ON FILE


Grand Jury Foreperson

RYAN K. PATRICK
United States Attorney

By: 

Jennie Basile
Assistant United States Attorney